JOHN M. BURKE

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April 2**5**, 2023

Honorable Ronnie Abrams United States District Court Southern District of New York 500 Pearl Street N.Y., N.Y. 10007

Re: <u>U.S.</u> v. <u>Saddam Mohamed Raishani</u> 17 Cr. 421

Dear Judge Abrams:

Please find enclosed a letter from my client, and the Staff Chaplain of F.C.I. Fairton filed in support of Mr. Raishani's motion for a sentence reduction. He appears to be making great strides toward rehabilitation and has taken numerous educational courses. I am also attaching B.O.P. certificates and documents demonstrating my client's steady progress and low risk of recidivism.

Thank you for your time and considration in this matter

Respectfully yours,

/S/ John Burke 718-875-3707

Attorney for Saddam Mohamed Raishani

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EXHIBITS

EXHIBITS

Saddam Raishani #76012-054 FCI Fairton P.O. Box 420 Fairton, NJ 08320

IN RE: Update for Supplementing the Record

Respectfully, I, Saddam Raishani present herein, newly completed programs and progress report. My endeavors towards rehabilition continues to be consistent and I have shown tremendous progress with my individual needs, including faith-based areas.

The newly presented programs include:

Faith-based Programs

- (i) Embracing Interfaith Cooperation;
 - *(I have become a mentor for other inmates.

 Attached hereto please find Chaplain Oliver's detailed letter of support regarding my progress, program participation, mentorship, and ultimately therein, Chaplain Oliver respectfully pleads for my release.)
- (ii) Threshold.

Vocational Training - NCCER Certification

- (i) Plumbing Level One (240 hours)
- (ii) Currently in the process of completing Carpentry Level One (235 hours)

Educational-based Programs

- (i) Masonry Class (16 hours)

Also, please find the most recent progress report with the added

statement from the Case Manager, which states in pertinent part:

"Inmate Raishani has completed several Nursing related courses such as; Articular System, Endocrine System, Nervous System, and Cardiovascular System. During his most recent time inmate Raishani has completed Plumbing/ Electrical/Masonry courses to help him reintegrate back into society."

Thank you for your time and consideration.

Sincerely

Saddam M. Raishani

#76012-054



U.S. Department of Justice Federal Bureau of Prisons Federal Correctional Institution

Fairton, New Jersey 08320

April 7, 2023

MEMORANDUM FOR L. McINTOSH, CASE MANAGER

FROM:

J. Oliver, Staff Chaplain

SUBJECT:

Saddam Raishani, Reg# 76012-054

Dear Sir / Ma'am:

I write to whole-heartedly recommend that you respectfully consider Mr. Raishani's request for compassionate release and/or reduction of sentence. I am a Chaplain in the Federal Bureau of Prisons. This memorandum recognizes a remarkable transformation in Mr. Raishani. I have been his Chaplain for six years here at FCI Fairton, since June 2017. During this time, he has demonstrated increasing levels of responsibility, accountability, and dedication to his faith and family.

It is my hope that he will soon be reunited with his family: Rawdha, his wife (31), Khalid his son (7), Muhammad, his father (82), and Mahlyah, his mother (78).

To that end, Mr. Raishani continues to shape his character and behavior through programming that focuses on shared values as a basis for interfaith cooperation in the community. He understands and adopts a key concept of our training sessions, what interfaith leader Eboo Patel calls the essential element of the American founder's dream, which is that "people of diverse background have established themselves here in equal dignity and mutual loyalty – that is, religious pluralism."

I mentioned in a memorandum dated July 20, 2022, that Mr. Raishani eagerly enrolled in two First Step Act courses which address issues that lower the risk of recidivism. He has since completed both courses, *Embracing Interfaith Cooperation*² and *Threshold*.³ These programs address specific areas of need where Mr. Raishani has succeeded to lower his risk of recidivism.

Allow me to highlight the positive impact that he experienced because of the shorter course, *Embracing Interfaith Cooperation*. This is a five-session course with video and live, peer-to-peer discussions among individuals who come from several major faith traditions: an American Evangelical Christian, an American born Muslim man and woman of first generation Muslim immigrants, Canadian and American Anglican Christians, a young American Jewish woman, and young man –also American–born into Jainism. These diverse vignettes are mirrored in our classroom peer-to-peer discussions.

Mr. Raishani approached me after the course to learn more about being an interfaith leader, both among fellow inmates and at home with his Rawdha, his wife, and Khalid, his son, and eventually the people in his local community of Brooklyn. To this end Mr. Raishani read two books that I recommended from Eboo Patel, the same author of the course. The first book entitled, Acts of Faith published in 2007, chronicles the autobiographical journey of Mr. Patel himself, who is founder and director of Interfaith Youth Core, a Chicago-based international non-profit building the interfaith cooperation movement. The second book by Patel is Interfaith Leadership, a practical guide to interfaith leadership, focused on practical avenues of working together, not merely dialogue, the latter of which tends toward religious narcissism. The desire to build, cooperate, and care for others is what inspires Mr. Raishani today to seek points of connection and commonality in neighborhoods, schools, even hospitals, where he hopes also to continue his career as a Registered Nurse and support his young family as a productive citizen in the community. Please refer to Saddam Raishani's letter to Chaplain Oliver, attached.

In summary, I have observed a remarkable transformation in Saddam Raishani's life that I believe to be the result of a sincere desire to make a difference in the world, starting with his family, and extending to his work and community. Again, I whole-heartedly recommend that you respectfully consider Mr. Raishani's request for compassionate release and reduction of sentence.

Respectfully,

Jeffrey Oliver

Chaplain, Bureau of Prisons

Chaplain, Colonel, (Ret.), USAR

Embracing Interfaith Cooperation, by Eboo Patel, Morehouse Education Resources, 2012.

² Embracing Interfaith Cooperation is a First Step Act, Productive Activity that fosters interfaith dialogue, discussion, and understanding. Interfaith engagement has been shown as an effective strategy to counter discrimination and religious extremism as well. The course builds on freedom of religion as a core ideal of the American dream. It embraces differences in religion to break down stereotypes and barriers for communities to better serve together toward the common good.

³ Threshold is a First Step Act, faith-based reentry program that helps strengthens key dimensions in life: spirituality, personal relationships, accepting personal responsibility, decision-making, healthy boundaries, mentalemotional-physical wellness, and continued educational growth.



Achievement Certificate

This Acknowledges That

Saddam M. Raishani

is an Interfaith Leader by his participation in the course

Embracing Interfaith Cooperation - 10 Hours

CERTIFICATE OF PROGRAM COMPLETION

AWARDED: NOVEMBER 17, 2022

J. Oliver, Staff Chaplain

T. Sastic, Supervisory Chaplain

A First Step Act, Productive Activity FCI Fairton

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Board of Trustees confers upon

Saddam Raishani

this certificate of completion for

Plumbing Level One

in the Standardized Craft Training Program on this Fourteenth day of October, in the year 2022



Boyd D. Worsham President & CEO, NCCER





THIS CERTIFIES THAT

Saddam Raishani

has successfully completed the requirements for:

Masonry

Certificate of Completion

October, 2022



ACE Coordinator



F.C.I. FAIRTON

THIS CERTIFIES THAT

Saddam Raishani

has successfully completed the requirements for:

Introduction to Electricity

Certificate of Completion

July, 2022

S. Greenshields

ACE Coordinator

16

Hours Completed



Dept. of Justice / Federal Bureau of Prisons Plan is for inmate: RAISHANI, SADDAM MOHAMED 76012-054 Report Date: 04-08-2023

SEQUENCE: 00369747



Facility: FAI FAIRTON FCI

Name: RAISHANI, SADDAM

Register No.: 76012-054

Quarters: C03-327L

Age: 36

Proj. Rel Date: 07-07-2034 Release Method: GOOD

Security Level: MEDIUM

DNA Status: NYM05547 / 07-07-2017

20 YEARS

Custody Level: IN

Date of Birth: 09-07-1986

Offenses and Sentences Imposed

Charge Terms In Effect

18:2339B ATTEMPTING TO PROVIDE MATERIAL SUPPORT OR RESOURCES TO A FOREIGN TERRORIST ORGANIZATION (CT-1) 18:371 CONSPIRING TO PROVIDE MATERIAL SUPPORT

OR RESOURCES TO FOREIGN TERRORIST ORGANIZATION (CT-2)

Date Sentence Computation Began: 04-02-2019

Sentencing District: NEW YORK, SOUTHERN DISTRICT

Days FSGT / WSGT / DGCT Days GCT or EGT / SGT Time Served

+ Jail Credit - InOp Time 0 / 0 / O 270 Years: 5 Months: 9 Days: 16 + 650 JC - 0 InOp

Detainers

Detaining Agency Remarks

NO DETAINER

Program Plans

Inmate Raishani arrived at FCI Fairton, New Jersey, on April 30,2019. His projected release date is July 7, 2034, via Good Conduct Time Release. Inmate Raishani has maintained an appropriate relationship with staff and is not considered a management problem. Overall, his adjustment at FCI Fairton, New Jersey, has been good.

Current FSA Assignments

Assignment	Description	Start
FTC INELIG	FTC-INELIGIBLE-REVIEWED	11-08-2019
INELIG AUT	FTC-INELIGIBLE OFF CODE - AUTO	12-17-2019
N-ANGER N	NEED - ANGER/HOSTILITY NO	02-17-2023
N-ANTISO N	NEED - ANTISOCIAL PEERS NO	02-17-2023
N-COGNTV N	NEED - COGNITIONS NO	02-17-2023
N-DYSLEX N	NEED - DYSLEXIA NO	05-29-2021
N-EDUC N	NEED - EDUCATION NO	02-17-2023
N-FIN PV N	NEED - FINANCE/POVERTY NO	02-17-2023
N-FM/PAR N	NEED - FAMILY/PARENTING NO	02-17-2023
N-M HLTH N	NEED - MENTAL HEALTH NO	02-17-2023
N-MEDICL N	NEED - MEDICAL NO	02-17-2023
N-RLF N	NEED - REC/LEISURE/FITNESS NO	02-17-2023
N-SUB AB N	NEED - SUBSTANCE ABUSE NO	02-17-2023
N-TRAUMA Y	NEED - TRAUMA YES	02-17-2023
N-WORK N	NEED - WORK NO	02-17-2023
R-LW	LOW RISK RECIDIVISM LEVEL	02-17-2023
i.∕t~&.A	LOW KISK KECIDIAISM FEAFF	02-17-2023

FSA Comments

Inmate is currently ineligible for the First Step Act and has a Low Risk of Recidivism (PATTERN).

Current Work Assignments

Facl	Assignment	Description	Start
FAI	C ORD R-AM	UNIT C RIGHT ORDERLY/AM	02-27-2023



Dept. of Justice / Federal Bureau of Prisons Plan is for inmate: RAISHANI, SADDAM MOHAMED 76012-054 SEQUENCE: 00369747 Report Date: 04-08-2023

Work Assignment Summary

** No notes entered **

Current Education Information

Facl	Assignment	Description	Start
FAI	ESL HAS	ENGLISH PROFICIENT	05-01-2014
FAI	GED HAS	COMPLETED GED OR HS DIPLOMA	12-06-2017

Education Courses

SubFact	Action	Description	Start	Stop
FAI		NCCER CARPENTRY LEVEL 1	01-12-2023	CURRENT
FAI	С	INTRO TO MASONRY	08-30-2022	10-18-2022
FAI	С	THE CARDIOVASCULAR SYSTEM	07-29-2022	08-12-2022
FAI	С	THE ARTICULAR SYSTEM	07-29-2022	08-12-2022
FAI	C	THE ENDOCRINE SYSTEM	07-29-2022	08-12-2022
FAI	С	THE NERVOUS SYSTEM	07-29-2022	08-12-2022
FAI	С	NCCER PLUMBING LEVEL 1	01-26-2022	09-19-2022
FAI	С	BEGINNER'S YOGA	07-15-2022	07-29-2022
FAI	С	STRESS MANAGEMENT	07-29-2022	07-29-2022
FAI	C	THE HUMAN BODY	07-15-2022	07-29-2022
FAI	С	STRETCHING	07-15-2022	07-29-2022
FAI	С	EXERCISE AND MENTAL HEALTH	07-15-2022	07-29-2022
FAI	С	INTRO TO ELECTRICITY	05-23-2022	07-18-2022
FAI	С	FREEDOM OF INFORMATION ACT	03-07-2022	05-02-2022
FAI	C	EAT TO WIN	03-26-2022	04-16-2022
FAI	C	ATHLETES & EFFICIENT HEARTS	02-26-2022	03-19-2022
FAI	W	STRETCHING	08-31-2021	09-27-2021
FAI	С	PREVENT CARDIOVASCULAR	08-01-2021	08-30-2021
FAI	С	NUTRITION FOR WELLNESS	04-26-2021	06-07-2021
FAI	С	PHYSICAL FITNESS	03-05-2021	05-12-2021
FAI	С	MUSCULAR FLEXIBILITY	03-29-2021	05-03-2021
FAI	С	WEIGHT MANAGEMENT SELF-PACED	02-16-2021	03-13-2021
FAI	С	CARDIO ENDURANCE SELF-PACED	12-29-2020	01-21-2021
FAI	С	NUMBERS & OPERATIONS ACE	07-08-2020	07-15-2020
FAI	С	NCCER CORE CURRICULUM B	07-26-2019	01-17-2020
FAI	С	BEGINNING LEATHER	10-04-2019	11-22-2019
FAI	C	INSIDE OUT DAD - PARENTING	06-03-2019	07-15-2019

Education Information Summary

Since his arrival at FCI Fairton and before, inmate Raishani has programmed constantly and this record can be seen above. He has taken several courses that can be used to further himself once released back into the community. These programs include, Money Smart, Tutor Training, Companion Training, Parenting, etc. Inmate Raishani has even taken classes more recently that will help in the pursuit of a nursing career since he is a registered Nurse in New York State. Inmate Raishani has completed several Nursing related courses such as; Articular System, Endocrine System, Nervous System, and Cardiovascular System. During his most recent time inmate Raishani has completed Plumbing/electrical/masonry course to help him reintegrate back into society.

Discipline Reports

Hearing Date	Prohibited Acts
07-20-2018	397 : PHONE ABUSE - NO CIRCUMVENTION

Discipline Summary

Inmate Raishani has only received one moderate level incident report over 4 years ago for phone abuse-no circumvention.

ARS Assignments

Facl	Assignment	Reason	Start	Stop
FAI	A-DES	OTHER AUTH ABSENCE RETURN	02-27-2023	CURRENT



Dept. of Justice / Federal Bureau of Prisons Plan is for inmate: RAISHANI, SADDAM MOHAMED 76012-054 **SEQUENCE: 00369747**

Report Date: 04-08-2023

Facl	Assignment	Reason	Start	Stop	
FAI	A-DES	US DISTRICT COURT COMMITMENT	04-30-2019	02-27-2023	
Current Care	Assignments				
Assignment	Desc	ription	Start		
CARE1	HEALT	THY OR SIMPLE CHRONIC CARE	04-30-2019		
CARE1-MH	CARE	I-MENTAL HEALTH	12-21-2017		
Current Med	ical Duty Status	Assignments			
Assignment	Desc	ription	Start		
MED HOLD	MEDIC	CAL HOLD - DO NOT TRANSFER	03-14-2023		
NO PAPER	NO PA	PER MEDICAL RECORD	04-30-2019		
REG DUTY	NO ME	DICAL RESTR-REGULAR DUTY	07-05-2017		
YES F/S	CLEAF	RED FOR FOOD SERVICE	07-05-2017		
Current PTP	Assignments		amalating trade astalogical in the tr		
Assignment	Desc	ription	Start		
RSW COMP	RESO	VE WORKSHOP COMPLETED	07-08-2022		
Current Drug	g Assignments				
Assignment	Description		Start		
ED NONE	DRUG EDUC	ATION NONE	05-23-2019		
NR COMP	NRES DRUG	TMT/COMPLETE	02-11-2019		
Physical and	l Mental Health S	Summary	California de la California de California d California de California de la California de California de California de California de California de Californi		
** No notes ente	ered **				

FRP Payment Plan

Most Recent Payment Plan

FRP Assignment: COMPLT FINANC RESP-COMPLETED Start: 01-26-2020

Inmate Decision: **AGREED** \$200.00 Frequency: QUARTERLY

Payments past 6 months: \$0.00 Obligation Balance: \$0.00

Financi	al Obligations					S. M. G. M.
No.	Туре	Amount	Balance	Payable	Status	
1	ASSMT	\$200.00	\$0.00	IMMEDIATE	COMPLETEDZ	

^{**} NO ADJUSTMENTS MADE IN LAST 6 MONTHS **

Financial Responsibility Summary

** No notes entered **

Release Planning

Inmate Raishani proposes the following release plan:

Raishani, Mohammed FATHER 1948 Gleason Ave. Bronx, NY 10472

phone (home): 718-597-8407

General Comments

Inmate Raishani has shown clear institutional conduct for over 4 years now and has continued to program and try to better himself throughout his incarceration. Inmate Raishani has shown great institutional adjustment and is respectful to all staff he encounters. Inmate Raishani has spoken about taking responsibility for his past actions and has proven that through the many programs he takes. Inmate Raishani is encouraged to continue this behavior and maintain clear conduct and good cell sanitation throughout the rest of his incarceration.



Dept. of Justice / Federal Bureau of Prisons Plan is for inmate: RAISHANI, SADDAM MOHAMED 76012-054 SEQUENCE: 00369747
Report Date: 04-08-2023



Dept. of Justice / Federal Bureau of Prisons
Plan is for inmate: RAISHANI, SADDAM MOHAMED 76012-054

SEQUENCE: 00369747
Report Date: 04-08-2023

Name: RAISHANI, SADDAM

Register Num: 76012-054

Age: 36

Date of Birth: 09-07-1986

DNA Status: NYM05547 / 07-07-2017

Inmate (RAISHANI, SADDAM MOHAMED, Register Num: 76012-054)

L/8/2023

Date

Chairperson

4/8/2023

Date

Case Manager

Date